

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLISON HETRICK, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ASCEND LEARNING, LLC,

Defendant.

Civil Action No. 1:25-CV-10103-NMG

**ASSENTED-TO MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF’S COMPLAINT**

Defendant Ascend Learning, LLC (“Ascend” or “Defendant”) hereby moves the Court, with the assent of Plaintiff Allison Hetrick, to extend its time to answer or otherwise respond to the Complaint in this matter up to and including April 7, 2025. As grounds for this Motion, Defendant states as follows:

1. On January 14, 2025, Plaintiff Allison Hetrick filed a Complaint against Defendant. *See* ECF No. 1.
2. Pursuant to Fed. R. Civ. P. 4 (d)(3), Defendant’s current deadline to respond to the Complaint is March 17, 2025.
3. Good cause exists for granting this Motion in that Defendant requires additional time to adequately respond to the Complaint filed on January 14, 2025, and a short extension of time will not cause undue delay, nor will it prejudice Plaintiff.
4. On March 6, 2025, during a general discussion about the case, the parties agreed to extend the time through and including April 7, 2025, for Defendant to answer, move against, or otherwise respond to the Complaint.

5. Defendant has not previously requested an extension of the deadline to answer or otherwise respond to the Complaint.

WHEREFORE, Defendant respectfully requests that the Court extend the time for Defendant to answer or otherwise respond to the Complaint up to and including April 7, 2025.

Dated: March 11, 2025

Respectfully submitted,

ASCEND LEARNING, LLC,

By its attorneys,

/s/ Jennifer L. Chunias

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RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), counsel for Defendant conferred with counsel for Plaintiff about the requested extension via email on March 11, 2025, and counsel for Plaintiff assented to the extension.

/s/ Jennifer L. Chunias
Jennifer L. Chunias

CERTIFICATE OF SERVICE

I, Jennifer L. Chunias, hereby certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 11, 2025.

/s/ Jennifer L. Chunias

Jennifer L. Chunias